July 3, 2013

NRC 2013-0053
10 CFR 50.54(f)

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Point Beach Nuclear Plant, Units 1 and 2
Docket 50-266 and 50-301
Renewed License Nos. DPR-24 and DPR-27

Response To Request For Additional Information Regarding Overall Integrated Plan In Response To Order EA-12-051, "Reliable Spent Fuel Pool Instrumentation"

References:

(1) U.S. Nuclear Regulatory Commission, Order Number EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Effective Immediately), dated March 12, 2012 (ML12056A044)

(2) U.S. Nuclear Regulatory Commission, Interim Staff Guidance JLD-ISG-2012-03, "Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation," Revision 0, dated August 29, 2012 (ML12221A339)

(3) NEI 12-02, Revision 1, "Industry Guidance for Compliance with NRC Order EA-12-051, 'To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation,'" dated August, 2012 (ML12240A307)

(4) NextEra Energy Point Beach, LLC's Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated October 26, 2012 (ML12305A200)

(5) NextEra Energy Point Beach, LLC's Overall Integrated Plan in Response to March 12, 2012 Commission Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated February 22, 2013 (ML13053A399)

(6) NRC Electronic Mail to NextEra Energy Point Beach, LLC, Point Beach Nuclear Plant, Units 1 and 2 - Draft Requests for Additional Information re: Integrated Plan for Reliable SFP Instrumentation (Order No. EA-12-051) (TAC Nos. MF0729 and MF0730), dated May 29, 2013 (ML13154A166)

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued an order (Reference 1) to NextEra Energy Point Beach, LLC (NextEra). Reference (1) was immediately effective and directed NextEra to implement and maintain reliable spent fuel pool water level instrumentation. Specific requirements are outlined in Attachment 2 of Reference (1).

Reference (1) required submission of an Overall Integrated Plan by February 28, 2013. The NRC Interim Staff Guidance (ISG) (Reference 2) was issued August 29, 2012, which endorsed industry guidance document NEI 12-02, Revision 1 (Reference 3), with clarifications and exceptions identified in Reference (2). Reference (3) provided direction regarding the content of this Overall Integrated Plan.

Reference (4) provided the NextEra initial status report regarding reliable spent fuel pool instrumentation, as required by Reference (1). Reference (5) provided NextEra's Overall Integrated Plan in Response to March 12, 2012 Commission Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051).

Enclosures 1 and 2 provide the responses to the request for additional information contained in Reference (6).

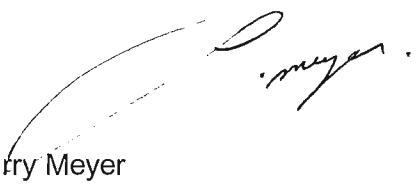
This letter contains no new Regulatory Commitments and no revisions to existing Regulatory Commitments.

If you have any questions please contact Mr. Michael Millen, Licensing Manager, at 920/755-7845.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on July 3, 2013.

Very truly yours,

NextEra Energy Point Beach, LLC



Larry Meyer
Site Vice President

Enclosures

cc: Director, Office of Nuclear Reactor Regulation
Administrator, Region III, USNRC
Resident Inspector, Point Beach Nuclear Plant, USNRC
Project Manager, Point Beach Nuclear Plant, USNRC
Ms. Lisa M. Regner, NRR/JLD/PMB, USNRC
Mr. Blake A. Purnell, NRR/JLD/PMB, USNRC
Mr. Steven R. Jones, NRR/DSS/SBPB, USNRC

ENCLOSURE 1

NEXTERA ENERGY POINT BEACH, LLC
POINT BEACH NUCLEAR PLANT

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING OVERALL INTEGRATED PLAN IN RESPONSE TO ORDER EA-12-051, "RELIABLE SPENT FUEL POOL INSTRUMENTATION"

The NRC staff determined that additional information was required (Reference 1) to enable the continued review of the NextEra Energy Point Beach, LLC (NextEra) Overall Integrated Plan (OIP) for the Point Beach Nuclear Plant, Units 1 and 2, in response to the March 12, 2012, U.S. Nuclear Regulatory Commission (NRC) Order modifying licenses with regard to requirements for Reliable Spent Fuel Pool (SFP) Instrumentation (Order Number EA-12-051; ML12054A679) (Reference 2). The following information is provided by NextEra in response to the NRC staff's request.

1.0 INTRODUCTION

By letter dated February 22, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13053A399), NextEra Energy Point Beach, LLC (NextEra, the licensee) submitted an Overall Integrated Plan (OIP) for the Point Beach Nuclear Plant, Units 1 and 2, in response to the March 12, 2012, U.S. Nuclear Regulatory Commission (NRC) Order modifying licenses with regard to requirements for Reliable Spent Fuel Pool (SFP) Instrumentation (Order Number EA-12-051; ADAMS Accession No. ML12054A679). The NRC staff endorsed Nuclear Energy Institute (NEI) 12-02, "Industry Guidance for Compliance with NRC Order EA-12-051, to Modify Licenses with Regard to Reliable SFP Instrumentation," Revision 1, dated August 2012 (ADAMS Accession No. ML12240A307), with exceptions as documented in Interim Staff Guidance (ISG) 2012-03, "Compliance with Order EA-12-051, Reliable SFP Instrumentation," Revision 0, dated August 29, 2012 (ADAMS Accession No. ML12221A339).

The NRC staff has reviewed the licensee's February 22, 2013, response and determined that the following requests for additional information (RAI) are needed to complete its technical review. If any part of this information is not available by the July 5, 2013, response date for these RAIs, please provide the date this information will be submitted.

2.0 LEVELS OF REQUIRED MONITORING

RAI-1

The OIP states, in part, that

1. ***Level adequate to support operation of the normal spent fuel pool cooling system*** *- Indicated level on either the primary or backup instrument channel of*

greater than or equal to 23 feet (plant elevation 60 feet 9 inches) above the top of the irradiated fuel assemblies seated in the storage racks. This level is above the spent fuel pool cooling suction and return connections' siphon breaker at 21 feet 11 inches (plant elevation 59 feet 8 inches) above the active fuel.

2. ***Level adequate to provide substantial radiation shielding for a person standing on the spent fuel pool operating deck*** *- Indicated level on either the primary or backup instrument channel of greater than 10 feet (plant elevation 47 feet 9 inches) above the top of the irradiated fuel assembles seated in the storage racks. This monitoring level ensures there is adequate water level to provide substantial radiation shielding for personnel to respond to Beyond-Design-Basis External Events and to initiate SFP makeup strategies.*

3. ***Level where fuel remains covered*** *- Indicated level on either the primary or backup instrument channel of greater than 2 feet 11 inches (plant elevation 40 feet 8 inches) above the top of the irradiated fuel assemblies seated in the storage racks. This monitoring level assures that there is adequate water level above the stored fuel seated in the rack. This monitoring level is where actions to implement makeup water addition should no longer be delayed. The top of the fuel assemblies is located at plant elevation 37 feet 9 inches. The top of the east west oriented wall opening that separates the northern and southern areas of the SFP is at plant elevation 40 feet 8 inches (see Section XVIII Drawing). Once the water level drops below this point, the single SFP has effectively been segregated into two separate pools. Consequently, plant elevation 40 feet 8 inches is the level at which actions to initiate water make-up should not be further delayed.*

Please provide the following:

a) *For level 1, specify how the identified location represents the HIGHER of the two points described in the NEI 12-02 guidance for this level. For level 3, specify whether the east/west oriented wall may be altered as to further segregate the north/south pool areas by the use of a gate or temporary wall section and if so, the conditions of its use.*

b) *A clearly labeled sketch depicting the elevation view of the proposed typical mounting arrangement for the portions of instrument channel consisting of permanent measurement channel equipment (e.g., fixed level sensors and/or stilling wells, and mounting brackets). Indicate on this sketch the datum values representing Level 1, Level 2, and Level 3 as well as the top of the fuel. Indicate on this sketch the portion of the level sensor measurement range that is sensitive to measurement of the fuel pool level, with respect to the Level 1, Level 2, and Level 3 datum points.*

NextEra Response RAI-1.a

For Level 1, the two points described in the NEI 12-02 guidance are; the level at which reliable suction loss occurs due to uncovering of the coolant inlet pipe, weir or vacuum breaker (depending on the design), or the level at which the water height, assuming saturated conditions, above the centerline of the cooling pump suction provides the required net positive suction head (NPSH) specified by the pump manufacturer or engineering analysis. To determine the higher of the two levels the following was taken into consideration:

(1) The level at which reliable suction loss occurs due to uncovering the coolant inlet pipe or any weirs or vacuum breakers associated with suction loss is established based on nominal coolant inlet pipe elevation and siphon breaker termination. This level is plant elevation 59 feet 8 inches.
(2) The level at which the normal SFP cooling pumps lose required NPSH, assuming saturated conditions in the pool, is below the elevation that defines Level 1 per (1) above. The centerline of the cooling pump suction is at plant elevation 59 feet 6 inches and the centerline of the SFP cooling pump impellers is at plant elevation 48 foot 2 inches. With the spent fuel pool at 212 degrees F, saturated conditions, the NPSHA is approximately 11.5 feet. The NPSHR for the pump is 5 feet at 212 degrees F. This results in a NPSHA/NPSHR value of approximately 2.3. Therefore, the NPSHA is greater than the NPSHR at saturated conditions and the siphon break will uncover prior to pump cavitation.

The higher of the above levels is (1). Therefore, Level 1 elevation is established at 59 feet 8 inches for both primary and backup instrumentation.

The SFP level instrument upper range will be at least 6 inches above Level 1 to account for channel accuracy and instrument loop uncertainty. From a practical perspective, the upper range capability will extend even higher (e.g. above normal operating level).

For Level 3, with regard to the spent fuel pool design, there are no means, temporary or permanent, to further segregate the north/south pool areas.

NextEra Response RAI-1.b

Enclosure 2 contains an elevation view of the proposed arrangement for the portions of the instrument channel consisting of permanent measurement channel equipment. In addition, the datum values for the levels 1, 2 and 3 are depicted as well as the sensitivity of the equipment.

3.0 INSTRUMENTATION DESIGN FEATURES

RAI-2

3.3 Mounting

The OIP states, in part, that

> *Mounting will be Seismic Class I. Installed equipment will be seismically qualified to withstand the maximum seismic ground motion considered in the design of the plant area in which it is installed.*

Please provide the following:

a) *The design criteria that will be used to estimate the total loading on the mounting device(s), including static weight loads and dynamic loads. Describe the methodology that will be used to estimate the total loading, inclusive of design basis maximum seismic loads and the hydrodynamic loads that could result from pool sloshing or other effects that could accompany such seismic forces.*

b) *A description of the manner in which the level sensor (and stilling well, if appropriate) will be attached to the refueling floor and/or other support structures for each planned point of attachment of the probe assembly. Indicate in a schematic the portions of the level sensor that will serve as points of attachment for mechanical/mounting or electrical connections.*

c) *A description of the manner by which the mechanical connections will attach the level instrument to permanent SFP structures so as to support the level sensor assembly.*

NextEra Response RAI-2.a, b, c

The answer to this request requires design information that is not available at this time. Information that is available will be provided in the August 2013 semi-annual update. If complete information is not available for the August 2013 update, complete information will be provided as soon as it is available.

RAI-3

3.4 Qualification

The OIP states, in part, that

> *Components of the instrument channels will be qualified for shock and vibration using one or more of the following methods:*
>
> - *Components are supplied by manufacturers using commercial quality programs (such as 1SO9001, Quality management systems – Requirements) with shock and vibration requirements included in the purchase specification*

at levels commensurate with portable hand-held device or transportation applications,

- *Components have a substantial history of operational reliability in environments with significant shock and vibration loading, such as portable hand-held device, or transportation applications, or*

- *Components are inherently resistant to shock and vibration loadings, such as cables.*

The effects of postulated seismic events on installed instrument channel components (with the exception of battery chargers and replaceable batteries), will be verified to ensure that the equipment design and installation is robust. Applicable components of the instrument channels will be qualified by the manufacturer (or otherwise tested) for seismic effects at response levels commensurate with the equipment mounting location. Instrument channel qualification will be based on the guidance provided in Sections 7, 8, 9, and 10 of IEEE Standard 344-2004, "IEEE Recommended Practice for Seismic Qualification of Class IE Equipment for Nuclear Power Generating Stations", or a substantially similar industrial standard. In addition, any of the below may also be used to provide additional assurance that the equipment will perform as designed during and following a seismic event: . . .

Please provide the following:

a) *A description of the specific method or combination of methods you intend to apply to demonstrate the reliability of the permanently installed equipment under Beyond-Design-Basis (BDB) ambient temperature, humidity, shock, vibration, and radiation conditions.*

b) *A description of the testing and/or analyses that will be conducted to provide assurance that the equipment will perform reliably under the worst-case credible design basis loading at the location where the equipment will be mounted. Include a discussion of this seismic reliability demonstration as it applies to a) the level sensor mounted in the SFP area, and b) any control boxes, electronics, or read-out and re-transmitting devices that will be employed to convey the level information from the level sensor to the plant operators or emergency responders.*

c) *Please provide a description of the specific method or combination of methods that will be used to confirm the reliability of the permanently installed equipment during and following seismic conditions to maintain its required accuracy.*

NextEra Response RAI-3.a, b, c

The answer to this request requires design information that is not available at this time. Information that is available will be provided in the August 2013 semi-annual update. If complete information is not available for the August 2013 update, complete information will be provided as soon as it is available.

RAI-4

3.5 Independence

The OIP states, in part, that

> *The primary instrument channel will be redundant to and independent of the backup instrument channel. Independence will be obtained through separation of the sensors, indication, backup battery power supplies, associated cabling and channel power feeds.*

Please provide the following:

a) *A description of how the two channels of the proposed level measurement system meet this requirement so that the potential for a common cause event to adversely affect both channels is precluded.*

b) *Further information on how each level measurement system, consisting of level sensor electronics, cabling, and readout devices will be designed and installed to address independence through the application and selection of independent power sources, the use of physical and spatial separation, independence of signals sent to the location(s) of the readout devices, and the independence of the displays.*

NextEra Response RAI-4.a

The permanently installed primary and backup instrument channels will be redundant to and independent of each other with respect to physical separation and the normal electrical power sources are from separate trains. The physical and electrical separation minimizes the potential for a single fault to adversely affect both channels.

The level sensors, located near the north-east corner and south-east corners of the SFP, will be physically separated to the extent practical by a distance greater than the shortest length of a pool side. The length of the shortest side of the SFP is approximately 18 feet long. The level sensors, with the primary located near the north-east corner of the pool and the backup located near the south-east corner of the pool, exceed the length of the shortest side of the SFP. The horizontal separation minimizes a common cause event in the area of the SFP from adversely affecting both channels.

The level transmitters, one per channel, will be physically separated from each other and are located two elevations below the level sensors in the Primary Auxiliary Building (PAB).

The third component, the level processor cabinets, one per channel, which includes the display and uninterruptible power supply (UPS), will be located on the same PAB plant elevation as the transmitter and are physically separated from each other by a horizontal distance exceeding 15 feet.

All interconnecting cable and raceway between the level sensor and transmitter and transmitter and processor will be routed such that the primary channel components are located and routed in the northern portion of the PAB, whereas the backup channel components are located and

routed in the southern portion of the PAB. The cabling for each channel will be located in physically independent raceways. These separation distances are well in excess of the design guidelines for Point Beach Nuclear Plant (PBNP) and minimize the potential for a single fault to affect both channels.

The primary level channel will be powered from a 120VAC Emergency Lighting Panel. This panel can be aligned to the Unit 2 Train A backup 1E emergency power supply. This panel is located in the PAB, accessible from plant elevation 66 feet and is located on the north wall near the SFP.

The backup level channel will be powered from a 120VAC Emergency Lighting Panel. This panel can be aligned to the Unit 1 Train B backup 1E emergency power supply. This panel is located in the PAB, accessible from plant elevation 66 feet and is located on the south wall near the SFP.

These panels are physically separated from each other and are normally powered from independent 1E backed power supplies which serve to minimize the potential for a single fault to affect both channels.

In the event that the primary power source is unavailable, the UPS will automatically swap from 120VAC to the battery backup power supply.

NextEra Response RAI-4.b

Two completely redundant, independent and permanently installed SFP level measurement channels, both from the same supplier, will be provided. Each channel will utilize guided wave radar (GWR) technology which uses the principle of time domain reflectometry to detect SFP water level.

Each level measurement channel will consist of a stainless steel sensor cable probe suspended in the SFP from a bracket attached to the operating deck at the side of the pool, a level transmitter located in an adjacent area below the cable probe, and a level processor cabinet containing the display and UPS located within the same PAB plant elevation as the transmitter but in the desired display area. Physical and spatial separation will be as described in RAI-4.a above.

Each level measurement channel will be powered by independent power sources. The primary instrument channel will be powered from a Unit 2 power source which can be aligned to Unit 2 Train A backup 1E power. The backup instrument channel will be powered from a Unit 1 power source which can be aligned to Unit 1 Train B backup 1E power.

The primary level channel signals between the level probe, transmitter and level processor cabinet will be entirely independent and separated from the backup level channel as described in RAI-4.a above.

RAI-5

3.6 Power Supplies

The OIP states, in part, that

> *Both channels will be powered from dedicated batteries and local battery chargers. The battery chargers for both channels will normally be powered from non-safety related 120V AC power. Minimum battery life of 72 hours will be provided. The battery systems will include provision for battery replacement should the battery charger be unavailable following the event. Spare batteries will be readily available. In the event of a loss of normal power the battery chargers could be connected to another suitable power source.*

If the level measurement channels are to be powered through a battery system (either directly or through an Uninterruptible Power Supply (UPS)), please provide the design criteria that will be applied to size the battery in a manner that ensures, with margin, that the channel will be available to run reliably and continuously following the onset of the BDB event for the minimum duration needed, consistent with the plant FLEX Program plans.

NextEra Response RAI-5

PBNP specified a design requirement for a minimum of 72 hours of battery life after an extended loss of AC power (ELAP) event for the spent fuel pool level instrument channels. PBNP committed to implementation of on-site Phase II FLEX response assets and strategies from appropriate means available at the time of the event and up to 72 hours within the event that may include portable equipment. The specified 72 hour battery mission time will provide ample margin to allow the implementation of Phase II FLEX actions within the guidelines provided as part of the implementing documents. The backup power portion (dedicated uninterruptible power supply including dedicated batteries) for the system is sized and provided by the same vendor as the entire system, so the design criteria used for sizing of the batteries is the responsibility of the vendor. The 72 hour battery life will be tested and verified during the Factory Acceptance Test or Site Acceptance Test prior to final acceptance of the system.

RAI-6

3.7 Accuracy

The OIP states, in part, that

> *Instrument channels will be designed such that they will maintain their design accuracy following a power interruption or change in power source without recalibration.*
>
> *Accuracy will consider SFP conditions, e.g., saturated water, steam environment, or concentrated borated water. Additionally, instrument accuracy will be sufficient to allow trained personnel to determine when the actual level exceeds the specified lower level of each indicating range (levels 1, 2 and 3) without*

conflicting or ambiguous indication. The accuracy will be within the resolution requirements of Figure 1 of NEI 12-02.

Please provide the following:

a) *An estimate of the expected instrument channel accuracy performance (e.g., in % of calibrated span) under both a) normal SFP level conditions (approximately Level 1 or higher) and b) at the BDB conditions (i.e., radiation, temperature, humidity, post-seismic and post-shock conditions) that would be present if the SFP level were at the Level 2 and Level 3 datum points.*

b) *A description of the methodology that will be used for determining the maximum allowed deviation from the instrument channel design accuracy that will be employed under normal operating conditions as an acceptance criterion for a calibration procedure to flag to operators and to technicians that the channel requires adjustment to within the normal condition design accuracy.*

NextEra Response RAI-6.a, b

The answer to this request requires design information that is not available at this time. Information that is available will be provided in the August 2013 semi-annual update. If complete information is not available for the August 2013 update, complete information will be provided as soon as it is available.

RAI- 7

3.8 Testing

The OIP states, in part, that

Instrument channel design will provide for routine testing and calibration consistent with Order EA-12-051 and the guidance in NEI 12-02. Instrument channel testing and calibration will be performed using existing plant work control processes. Details will be determined during the engineering and design phase.

Please provide the following:

a) *A description of the capability and provisions the proposed level sensing equipment will have to enable periodic testing and calibration, including how this capability enables the equipment to be tested in-situ.*

b) *A description of how such testing and calibration will enable the conduct of regular channel checks of each independent channel against the other, and against any other permanently-installed SFP level instrumentation.*

c) *A description of how functional checks will be performed, and the frequency at which they will be conducted. Describe how calibration tests will be performed, and the*

frequency at which they will be conducted. Provide a discussion as to how these surveillances will be incorporated into the plant surveillance program.

d) *A description of what preventative maintenance tasks are required to be performed during normal operation, and the planned maximum surveillance interval that is necessary to ensure that the channels are fully conditioned to accurately and reliably perform their functions when needed.*

NextEra Response RAI-7.a, b, c, d

The answer to this request requires design information that is not available at this time. Information that is available will be provided in the August 2013 semi-annual update. If complete information is not available for the August 2013 update, complete information will be provided as soon as it is available.

RAI-8

3.9 Display

The OIP states, in part, that

> *Remote indication will be provided in the Primary Auxiliary Building. This provides an indication that will be accessible during post accident conditions.*
>
> *This location will ensure that it meets the following criteria:*
>
> - *Promptly accessible to the appropriate plant staff giving appropriate consideration to various drain down scenarios,*
> - *Outside of the area surrounding the SFP floor, e.g., an appropriate distance from the radiological sources resulting from an event impacting the SFP,*
> - *Inside a structure providing protection against adverse weather, and*
> - *Outside of any very high radiation areas or LOCKED HIGH RAD AREA during normal operation.*

Please provide the following:

a) *A justification for prompt accessibility to displays including primary and alternate route evaluation, habitability at display location(s), continual resource availability for personnel responsible to promptly read displays, and provisions for communications with decision makers for the various SFP drain down scenarios and external events.*

b) *The reasons justifying why the locations selected enable the information from these instruments to be considered "promptly accessible" to various drain-down scenarios and external events.*

NextEra Response RAI-8.a

The proposed location for the SFP wide range level instrument displays will be on the 26 foot elevation of the PAB near the C-59 Waste Disposal Control Panel. The displays will be approximately 40 feet below the level sensors in an adjacent area, outside the area surrounding the SFP floor and are physically separated from each other within the PAB. They will be physically protected from the environmental and radiological conditions resulting from a beyond design basis (BDB) event.

The 26 foot elevation of the PAB is contained within a Seismic Class I structure that has multiple access routes. Normal access is provided from the south through the Radiation Protection Checkpoint. Alternate access routes are available from the Unit 1 Turbine Hall 8 foot elevation through door number 20 to the PAB and up the stairs to the C-59 panel area. Another alternate access route is available from Unit 2 Turbine Hall 8 foot elevation through door number 12 to the PAB and up the stairs to the C-59 area. Environmental conditions on the 26 foot and 8 foot levels are expected to remain habitable and accessible at saturation conditions in the SFP.

The 26 foot elevation near the C-59 panel is a designated watch station and normally manned with a qualified Auxiliary Operator to promptly read displays and communicate with decision makers during the various SFP drain down scenarios and external events. Hand held radios, person to person contact or the PBX phone system are communication systems available to transmit the information.

NextEra Response RAI-8.b

The information from the SFP level instrument is promptly accessible for various drain-down scenarios and external events based on the reasons laid out in the response to RAI-8.a.

4.0 PROGRAM FEATURES

RAI-9

4.2 Procedures

The OIP states, in part, that

> *Procedures will be developed using guidelines and vendor instructions to address the maintenance, operation, and abnormal response issues associated with the new SFP instrumentation.*
>
> *Procedures will address a strategy to ensure SFP water level addition is initiated at an appropriate time consistent with implementation of NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide".*

Please provide a description of the standards, guidelines and/or criteria that will be utilized to develop procedures for inspection, maintenance, repair, operation, abnormal response, and administrative controls associated with the SFP level instrumentation, as well as storage and installation of portable instruments.

NextEra Response RAI-9

The answer to this request requires design information that is not available at this time. Information that is available will be provided in the August 2013 semi-annual update. If complete information is not available for the August 2013 update, complete information will be provided as soon as it is available.

RAI-10

4.3 Testing and Calibration

The OIP states, in part, that

> *Processes will be established and maintained for scheduling and implementing necessary testing and calibration of the primary and backup spent fuel pool level instrument channels to maintain the instrument channels at the design accuracy. Testing and calibration of the instrumentation will be consistent with vendor recommendations and any other documented basis. Calibration will be specific to the mounted instrument and the monitor.*

Please provide the following:

a) *Further information describing the maintenance and testing program the licensee will establish and implement to ensure that regular testing and calibration is performed and verified by inspection and audit to demonstrate conformance with design and system readiness requirements. Include a description of your plans for ensuring that necessary channel checks, functional tests, periodic calibration, and maintenance will be conducted for the level measurement system and its supporting equipment.*

b) *A description of how the guidance in NEI 12-02 section 4.3 regarding compensatory actions for one or both non-functioning channels will be addressed.*

c) *A description of what compensatory actions are planned in the event that one of the instrument channels cannot be restored to functional status within 90 days.*

NextEra Response RAI-10.a, b, c

The answer to this request requires design information that is not available at this time. Information that is available will be provided in the August 2013 semi-annual update. If complete information is not available for the August 2013 update, complete information will be provided as soon as it is available.

References

1. NRC Electronic Mail to NextEra Energy Point Beach, LLC', Point Beach Nuclear Plant, Units 1 and 2 - Draft Requests for Additional Information re: Integrated Plan for Reliable SFP Instrumentation (Order No. EA-12-051) (TAC Nos. MF0729 and MF0730), dated May 29, 2013 (ML13154A166)
2. NextEra Energy Point Beach, LLC's Overall Integrated Plan in Response to March 12, 2012 Commission Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated February 22, 2013 (ML13053A399)
3. NextEra Energy Point Beach, LLC's Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 22, 2013 (ML13053A401)

ENCLOSURE 2

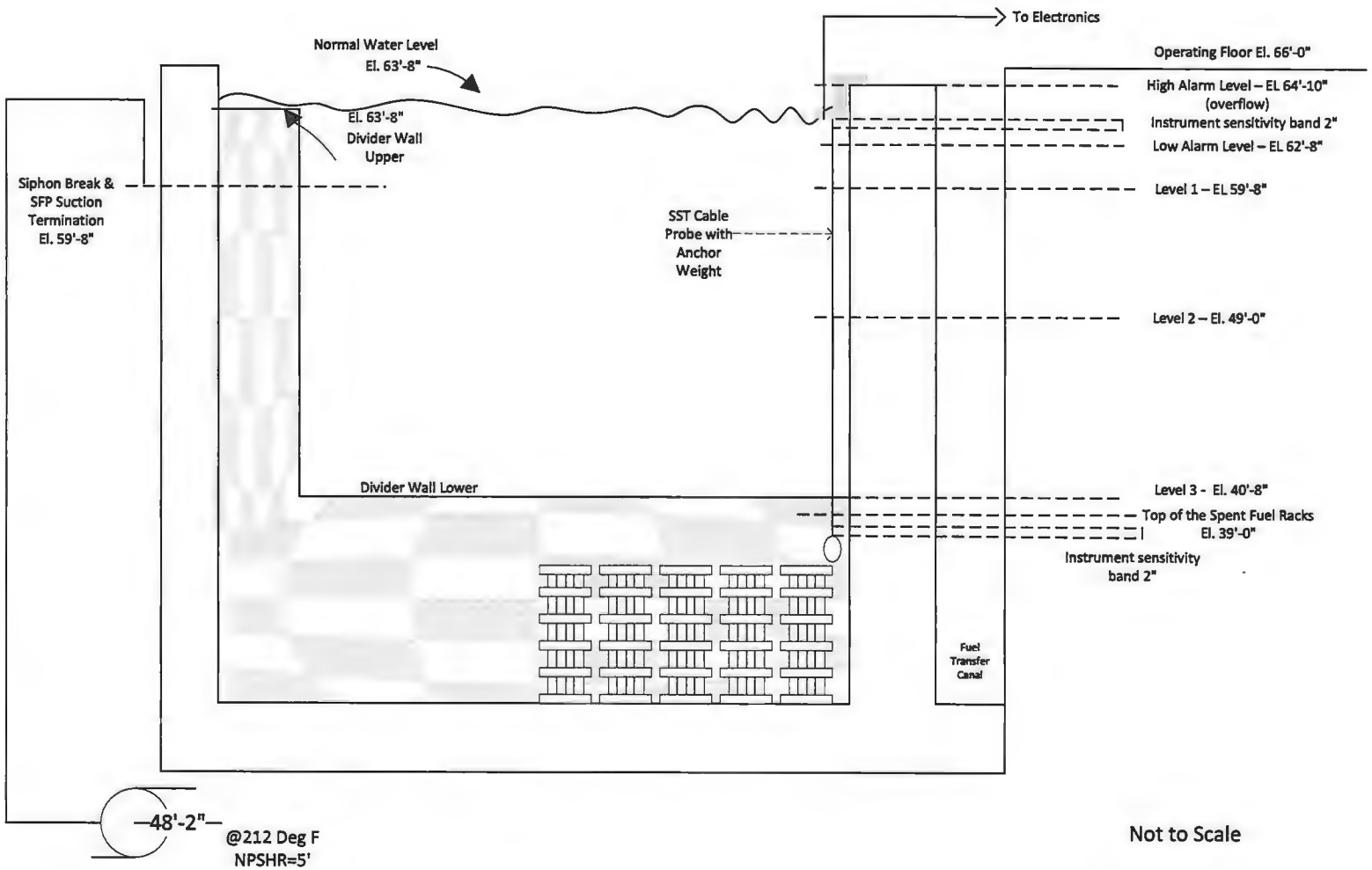
NEXTERA ENERGY POINT BEACH, LLC
POINT BEACH NUCLEAR PLANT

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING OVERALL INTEGRATED PLAN IN RESPONSE TO ORDER EA-12-051, "RELIABLE SPENT FUEL POOL INSTRUMENTATION"

PBNP – SPENT FUEL POOL LEVELS
ELEVATION VIEW

1 page follows

PBNP – Spent Fuel Pool Levels
Elevation View



Not to Scale